

# Data Protection and Privacy Policy

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## Introduction

At Busy Bees Education and Training Limited (Busy Bees Training) we recognise that our excellent people with outstanding skills form the strong foundations needed to deliver an exceptional service and continue the success of the company. With this in mind, we are passionate about learning and development and give all our employees and learners the opportunities to develop the skills and confidence needed to reach their full potential and succeed.

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Your Privacy is important to Busy Bees Education and Training so we have developed a number of privacy notices which cover how we collect, use, process, transfer and store your personal information. All your personal Information shall be held and used in accordance with The General Data Protection Regulation (2018). Our full Data Protection Policy can be accessed by contacting our Data Protection Officer (DPO) via email on [dpo@busybees.com](mailto:dpo@busybees.com)

Busy Bees Education and Training is the data controller of your Information, is required to collect and process data for several purposes concerning its staff, contractors, website users and any other individual who comes into contact with the company. In gathering and using this data Busy Bees Education and Training is committed to protecting all individual's rights of freedom and privacy.

The policies below are intended to inform you how we gather, define, and utilise your personal information such as name, address, date of birth, email address and mobile phone number.

### **Privacy Policy for website users**

What personal data we collect about you as a visitor to our website

When you visit our website, you may provide us with two types of information:

- personal Information you provide to us on an individual basis during a registration
- website use information collected as you and others browse our website.

We maintain the highest standards of security, however the transmission of information via the internet is not completely secure. So, whilst we will do our best to protect your Information, we cannot ensure the security of your data transmitted to our Website.

Any information you submit is sent at your own risk. Once we have received your Information we will use strict procedures and security features to minimise the risk of unauthorised access.

Similar to other commercial websites, our Website uses a technology called "cookies" (see explanation below, "What Are Cookies?") and web server logs to collect information about how our Website is used.

Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our Website, and the websites visited just before and just after our Website.

### **How we use the information you provide to us**

We, and other members of the Busy Bees Childcare group of companies use your Information in the following ways:

- to ensure that content from our Website is presented in the most effective and efficient manner for you and your computer;
  - to allow you to register, request information or order any products and services available on our Website where you choose to do so;
  - to communicate with your employer, where applicable to ensure we meet Government funding requirements for some of our programmes
  - to pass your Information to other companies ONLY in the Busy Bees group to supply goods, services or information requested by you and we may pass your Information to them for this purpose;
  - to notify you about changes to our service;
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- in accordance with your authorisation at the point of Registration;
- if you have given your consent at the point of Registration, to contact you with information about products, services and special offers that you request from us, or that we feel may be of interest to you or to ask you to participate in one of our customer satisfaction surveys.
- We may pass your Information to carefully selected third party organisations:
- if we buy or sell any business or assets in which case we may disclose your Information to the seller or buyer of such business or assets;
- if we are under a duty to disclose or share your personal data to comply with any legal obligation or in order to enforce or apply our terms and conditions and other agreements or protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

### **How we protect your information**

Email is not recognised as a secure medium of communication. For this reason, we request that you do not send private, sensitive or confidential information to us by email, and should you do so it is at your own risk.

### **Storage of data**

The data you provide to us via the website we will hold in our software systems. Data relating to you will be kept at our head office. Personal data held within a software system will be securely protected with individual logins, which will only be given to those who need to access the data. If you wish to see the full version of our IT security policy, please contact the Data Protection Officer.

### **Your data subject rights**

You may request access to all your Information that we collect online and maintain in our database by writing to us at the following address: Data Controller, Latchford House, Shenstone Business Park, Lynn Ln, Shenstone, Lichfield WS14 0SB or emailing our Data Protection Officer (DPO) on [dpo@busybees.com](mailto:dpo@busybees.com)

We are obliged under GDPR to complete your request free of charge and within 1 month of receipt of the request.

### **Your Consent**

By using our website, you consent to our collection and use of your Information as described in this Privacy Policy. If we change our privacy policies and procedures, we will post those changes on our Website to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it.

### **Where we store your personal data**

Data and Information that we collect from you may be transferred to and stored at a destination outside the European Economic Area ("EEA"). You consent to our sending and storing Your Information outside the EEA. We will take all steps reasonably necessary to ensure that your Information is treated securely and in accordance with this Privacy Policy.

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## **What Are Cookies?**

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site's web server/computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies.

Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites, therefore private information supplied to one web site cannot be read by another organisation.

A more detailed look at how we use cookies on the Busy Bees Education and Training web site can be found by clicking the 'Cookie Settings' button at the bottom of all web pages on the site, you will also find further useful information at <https://cookiepedia.co.uk/giving-consent-to-cookies>

## **How We Use Information We Collect from Cookies**

As you browse and navigate around our Website, the website uses cookies to differentiate you from other users to prevent you from seeing unnecessary advertisements or requiring you to log in more than is necessary for security.

Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our Website and which parts of the website are most popular. This helps us gather feedback so that we can improve our Website and better serve our customers.

Cookies do not allow us to gather any personal Information about you and we do not generally store any personal Information that you provided to us in your cookies.

## **What personal data we collect about you**

Busy Bees Education and Training contractual responsibilities include but are not limited to the collection of the following personal data:

- Personal details (name, date of birth, gender)

- Special Educational Needs information

We do hold some special category data about you regarding race, ethnic origin, religion and health information. The special category data is only collected as required by the Local Authority or other public bodies for legal and contractual purposes. We comply fully with the requirements of GDPR in relation to special category data and are aware of the sensitive nature of the information.

It is the duty of you, the Data Subject to let us know of any personal data that has changed or is incorrect, we send out annual declaration forms to ensure the data we hold on you is accurate.

## **How we process your personal data**

Busy Bees Education and Training complies with its obligations under the GDPR by keeping personal data up to date; storing and destroying it securely; not collecting or retaining excessive amounts of data; protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. All the data we process, we do so to fulfil the contract we have with you.

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Whilst much of the data you provide to us is mandatory to carry out the contract you hold with us, some of it is provided on a voluntary basis. To comply with the GDPR we will inform you at the time of collection whether the information you are asked to provide is mandatory. Where personal data is not required for legal or contractual reasons, we will give you the opportunity provide your consent for us to use your data for that purpose.

### **The lawful basis in which we process this data**

Busy Bees Education and Training collects and process all the information you provide to us under the contractual lawful process. It is necessary to process this data to be able carry out the requirements of the contract. Without this data we will not be able to fulfil your contract and thus not be able to deliver your training.

Data regarding your ethnicity, race and religion is only processed under the requirements of Local Authorities and public bodies and upholding Busy Bees Education and Training equal opportunities policy and ensuring we are meeting the Equality Act 2010.

Some data will only be processed if explicit consent is given. This can include the ability to take photographs of you and using your details for direct marketing. Where this is the case we will ask for your consent at the time we collect your data.

### **Who collects this data?**

Busy Bees Education and Training collects most of its data directly from the individual themselves. The information we collect about you will all be obtained from the application pack you fill out when you first enroll. Additional data is collected as part of the Annual Declaration and on an ad-hoc basis as required.

### **Storage of data**

All your data is either kept in our software systems or in paper format. Data relating to you and your child will be kept in the nursery your child attends as well as at our supporting office locations. Personal data held within a software system will be securely protected with individual logins, which will only be given to those who need to access the data. If you wish to see the full version of our IT security policy please contact the Data Protection Officer.

All data stored in paper format will be kept in a safe location where only those who are authorised to access it, can. This may include being locked away in a filing cabinet or other safe secure location.

### **Who and why we share this data**

We are legally obliged to pass some of your details on to third parties for legal reasons such as public bodies. This includes Local Authorities, Ofsted, Education Scotland, NHS, Police and enforcing agencies. We will not give information about you to anyone outside of the company without your explicit consent unless the law or our terms and conditions allow us to.

We may also share data with organisations for trend analysis. The processing of this kind of data we are not legally required to do and therefore we will ask you for your explicit consent for us to share your data for this purpose.

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### **Data retention periods**

Busy Bees Education and Training is committed to ensuring we do not hold personal data for any longer than necessary.

Data which we hold under contract is subject to specified retention periods. These are as follows:

- Safeguarding information - 10 years
- Medical and health data - Will not be destroyed
- Accident data - Will not be destroyed
- Data and information relating to any learning undertaken will be as specified in learning agreements and as stated in statutory requirements

Once the data has been used for its original purpose and the retention period has expired, we will appropriately dispose of the data.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Privacy Notice, we will provide you with a new notice explaining this new purpose. Where and whenever necessary, we will seek your consent to the new processing.

### **Your data subject rights**

Under GDPR you have the right to request access to any of the data held by Busy Bees Education and Training about you. If you wish to make a subject access request please contact the Data Protection Officer (DPO).

If you feel Busy Bees Education and Training has not handled your personal details adequately or you are unhappy with how your data request has been dealt with contact the Data Protection Officer (DPO).

### **Recruitment**

If you are successful and are offered a position to work for Busy Bees Education and Training we will hold your data under contract. Further information on what information we hold on employees, how we store it and how we process this data can be found on the Privacy Notice for Employees below.

If you are unsuccessful we will dispose of any personal data you have supplied us immediately unless you have given explicit consent for us to keep this information.

Busy Bees Education and Training is the data controller for any personal information you provide to us regarding yourself as an employee of Busy Bees Education and Training. This means we decide how your personal data is processed and for what purpose.

Busy Bees Education and Training is required to collect and process data for a number of purposes concerning its staff, contractors and any other individual who comes into contact with the company. In gathering and using this data Busy Bees Education and Training is committed to protecting all individual's rights of freedom and privacy and meeting the requirements of the General Data Protection Regulation 2018 (GDPR).

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## **What personal data we collect about you**

Busy Bees contractual responsibilities include but are not limited to the collection of the following personal data:

Personal information (name, employee number, national insurance number)

Contact information (phone number, email address)

Work absence information (number of absences and reasons)

Qualification and educational history

Bank details (name of bank, account number and sort code)

Medical and health information

Contract information (start date, hours worked, salary information)

We do hold some special category data about you regarding your race, ethnic origin, religion and health information. The special category data we hold we only process if it is essential for the purpose of a contract or required for legal reasons and is adequately protected because of the sensitive nature of the information. We only use this information for equal opportunity research and feedback.

It is the duty of the data subject to let us know of any personal data that has changed so we can update our records and ensure the data we hold on you is accurate.

## **How we process your personal data**

Busy Bees Education and Training complies with its obligations under the GDPR by keeping personal data up to date; storing and destroying it securely; not collecting or retaining excessive amounts of data; protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. All the data we process from employees, we do so to fulfil the contract.

Busy Bees Education and Training hold and processes your data to be able to:

- Enable individuals to get paid
- Contact employees when necessary

## **The lawful basis in which we process this data**

Busy Bees Education and Training collects and process all the information you provide to us about yourself as an employee under the contractual lawful process. It is necessary to process this data to be able carry out the requirements of the contract. Without this data we will not be able to fulfil the contract and thus not be able to employ you as a member of staff here at Busy Bees Education and Training

The health and medical data you provide to us is legally required and is vital to keep you safe whilst you are employed with us. It is also under your contract that you supply sick notes to us as evidence of proof of illness and ensure you are paid for these days.

Data regarding your ethnicity, race and religion is only processed for monitoring and upholding Busy Bees Education and Training equal opportunities policy and ensuring we are meeting the Equality Act 2010.

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### **Who collects this data**

Busy Bees Education and Training collects most of its data directly from the individual themselves. The information we collect about you will be obtained from the application you complete during the recruitment process or new starter pack you fill out when you first become employed with Busy Bees Education and Training. Additional data is collected as part of the Annual Declaration and on an ad-hoc basis as required.

### **Storage of data**

All your data is either kept in our software systems or in paper format. Personal data held within software systems will be securely protected with individual logins, which will only be given to those who need to access the data. If you wish to see the full version of our IT security policy it is available upon request.

All data stored in paper format will be kept in a safe environment where only those who need it can access it. This may include being locked away in a filing cabinet or other secure storage facility.

### **Who and why we share this data**

We are legally obliged to pass some of your details on to third parties such as public bodies or civil services. These may include, the police, the courts, HMRC and pension providers. We limit the sharing of data to third parties as far as practicable and only share data where it is necessary for legal reasons or for the processing of the contract.

### **Data retention periods**

Busy Bees Education and Training is committed to ensuring we do not hold personal data for no longer than necessary. We are required by law to hold some of the personal data you provide us for certain periods of time. Once the data has been used for its original purpose and the retention period has expired, we will appropriately dispose of the data.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, we will provide you with a new notice explaining this new purpose. Where and whenever necessary, we will seek your consent to the new processing.

### **Your data subject rights**

Under GDPR you as an employee have the right to request access to any of the data held by Busy Bees. If you wish to make a subject access request, please contact the Data Protection Officer (DPO).

If you feel Busy Bees Education and Training has not handled your personal details adequately or you are unhappy with how your data request has been dealt with contact the Data Protection Officer (DPO).

### **Consent**

Busy Bees Education and Training is committed to ensuring where consent is required, it is freely given, specific and unambiguous. Where consent is required for additional processing, data subjects are given

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the opportunity to freely give their consent to us processing that data for the specified purpose. Additional consent forms will be distributed to gather additional permission.

### **Contact Us**

If you have any questions or suggestions regarding our privacy policy, please contact us:

DPO - Head of Compliance

Latchford House,

Shenstone Business Park,

Lynn Ln,

Shenstone,

Lichfield

WS14 0SB

Email: [dpo@busybees.com](mailto:dpo@busybees.com)

Liz Hemmings - Systems and Compliance Manager

Latchford House

Shenstone Business Park

Lynn Lane

Shenstone

Lichfield

WS14 0SB

Email: [liz.hemmings@bbtraining.com](mailto:liz.hemmings@bbtraining.com)

### **Statutory information about Busy Bees Childcare**

Registered in England and Wales Registered Company No. : 4968957

Registered Office: Busy Bees, St.Matthews, Shaftsbury Drive, Burntwood, Staffordshire. WS7 9QP

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